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October 2, 2020

BY ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Virgil Griffith,*
20 Cr. 015 (PKC)**

Dear Judge Castel:

Defendant Virgil Griffith respectfully moves this Court for a two-week extension of the motions schedule, which was set at the July 23, 2020 hearing. (*See* 7/23/20 Minute Entry.) This the first request for an extension, and the government does not object.

The defense has been diligent in its preparations, but it needs additional time because the anticipated motions raise a number complex and novel legal issues. The defense also needs more time because it still is reviewing the government's ongoing and substantial discovery productions, with the most recent ones occurring on August 26, 2020, and on September 9, 14, and 22, 2020. The parties have been working in good faith to resolve discovery disputes and have resolved many of them. The defense appreciates the recent government discovery productions but, because of the overall volume, they take time to review and factor into the forthcoming motions. For example, one of these recent productions raises the possibility of a new suppression motion.

The defense proposes the following schedule:

- Defense Motions – **October 22, 2020** (currently October 8, 2020)
- Government Response – **November 19, 2020** (currently November 5, 2020)
- Defense Reply – **December 3, 2020** (currently November 19, 2020)

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For all the above reasons, Mr. Griffith respectfully requests that the Court grant the requested new motions schedule.

Sincerely,

A handwritten signature in black ink, appearing to read "Keri Curtis Axel". The signature is fluid and cursive, with the first name "Keri" being the most prominent.

Keri Curtis Axel (admitted *pro hac vice*)

Brian E. Klein

Baker Marquart LLP

-and-

Sean S. Buckley

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Attorneys for Virgil Griffith

cc: AUSAs Kyle Wirshba, Kimberly Ravener, and Michael Krouse